

EXHIBIT “L”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Civil Action No.:
21-cv-04907

TERESA MCCOY,

Plaintiff,

AFFIDAVIT

-against-

THE TJX COMPANIES, INC.,

Defendant.

-----X

STATE OF NEW YORK)
)
) ss.:
COUNTY OF KINGS)

I, Arturo Cepeda, being duly sworn, deposes and says:

1. I am employed at the HomeGoods located at 795 Columbus Avenue, New York, New York.

2. I have been employed by the company for approximately 4 years as a Sales Associate.

3. My duties include constantly monitoring the sales floor to ensure that all merchandise is in its place. If any merchandise is found to be out of place, I immediately remedy same.

4. I was working on July 28, 2019 at the time of the alleged accident. I did not witness the incident.

5. I reviewed a photograph of the stools involved in the alleged accident.

6. On July 28, 2019, such items were located in the furniture department. The stools were displayed on platforms. Stools with wooden legs, such as those depicted in the photographs would not be displayed directly on the sales floor.

7. At no time would stools be displayed one on top of another.

8. Throughout the course of my work day, I constantly walk the entire sales floor which takes approximately 15 to 20 minutes to complete. I was last in the furniture department within 15 to 20 minutes prior to the alleged accident and did not observe any stools out of place.

9. Had I seen the stools on the floor or out of place, I would have immediately put them back.

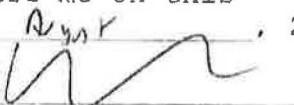
10. I am unaware of any prior complaints being made about the manner in which stools were displayed in the store.

11. I am unaware of any prior similar incidents occurring on the premises.

Dated: August 6th, 2021


Arturo Cepeda

Sworn to before me on this
6th day of August, 2021


NOTARY PUBLIC
6-00148

Mary C. Azzareto
Notary Public, State of New York
Reg. No. 02AZ6234719
Qualified in Suffolk County
My Commission Expires on 1/24/2023